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**VIA ECF**

The Honorable Robert M. Levy  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Airwair International Ltd, a company of the United Kingdom, v. Primark US Corporation, a Delaware corporation, Primark Limited, a limited company in England and Wales, Case No. 19-cv-06189 LDH-RML***

Dear Judge Levy:

Defendants respond briefly to Plaintiff's proposed Confidentiality Order filed on November 30, 2020. (Dkt. No. 27). Plaintiff proposed substantive edits to two paragraphs in Defendants' proposed Confidentiality Order, which was submitted to the Court at Dkt. No. 26. Defendants do not object to Plaintiff's proposed edits to Paragraph (g). Plaintiff's proposed edits to Paragraph (d), however, are ambiguous, confusing, and inconsistent with Your Honor's ruling during the November 24, 2020 telephonic hearing. Specifically, the highlighted portion of Paragraph (d) suggested by Plaintiff ("Subject to the provision for inhouse counsel to have access to documents designated "highly confidential" or "attorneys' eyes only") is confusing, appears to imply that house counsel would have access to material designated as "attorneys' eyes only", and is unnecessary in light of Paragraph (g).

Defendants attempted to resolve this issue with Plaintiff directly, but Plaintiff insisted on including the objectionable language in Paragraph (d). Accordingly, Defendants respectfully request that the Court adopt Defendants' proposed Confidentiality Order (Dkt. No. 26) and include Plaintiff's substantive proposed edits to Paragraph (g) but not (d). For ease of reference, Defendants attach hereto an updated proposed Confidentiality Order with these edits.

WINSTON & STRAWN LLP

By: /s/ Jennifer A. Golinveaux  
Jennifer A. Golinveaux

Attorneys for Defendants  
PRIMARK US CORPORATION  
PRIMARK LIMITED